



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

1
2 **MEMORANDUM**
3
4

5 TO: The Commission
6
7 FROM: Lisa J. Stevenson
8 Acting General Counsel
9
10 Kathleen M. Guith
11 Associate General Counsel for Enforcement
12
13 BY: Stephen Gura *SG*
14 Deputy Associate General Counsel for Enforcement
15
16 Mark Shonkwiler *MS*
17 Assistant General Counsel
18
19 Camilla Jackson Jones *CJJ*
20 Attorney
21
22 SUBJECT: MUR 7211 (Patrick)
23 Pre-Probable Cause Conciliation
24

25
26 **I. INTRODUCTION**
27

28 Attached is a signed conciliation agreement negotiated with Thomas H. Patrick.
29 Attachment 1. The agreement would settle Mr. Patrick's violations of 52 U.S.C. §§ 30104(c)
30 and 30120 of the Federal Election Campaign Act of 1971, as amended (the "Act"), for failing to
31 disclose independent expenditures for public communications he distributed in August 2012, and
32 for failing to include disclaimers in those communications.¹
33

34 **II. DISCUSSION**
35

36 On July 11, 2017, the Commission found reason to believe that Mr. Patrick violated the
37 Act by making independent expenditures for a mailer distributed in August 2012, and failing to
38 file disclosure reports or include disclaimers for those communications. The Commission also
39 authorized pre-probable cause conciliation

¹ This matter is severely imperiled under the statute of limitations. Although we do not know for certain, we believe that the disclaimer violation expires under the SOL at the end of August 2017. The reporting violation expires on October 15, 2017.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

XXXXXXXXXXXX

1 **III. RECOMMENDATIONS**

2
3
4
5
6
7
8

1. Accept the attached conciliation agreement with Thomas H. Patrick;
2. Approve the appropriate letters; and
3. Close the file.

UNRECORDED